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Unsecured Creditors of Purdue Pharma L.P., et al.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
PURDUE PHARMA L.P., <i>et al.</i> ,	:	Case No. 19-23649 (SHL)
	:	
Debtors. <sup>1</sup>	:	(Jointly Administered)
	:	

**THIRTY-NINTH MONTHLY FEE STATEMENT OF COLE SCHOTZ P.C.  
FOR COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD  
FROM MAY 1, 2023 THROUGH MAY 31, 2023**

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Applicant</b>	Cole Schotz P.C.
<b>Name of Client</b>	Official Committee of Unsecured Creditors
<b>Petition Date</b>	September 15, 2019
<b>Date of Order Approving Employment</b>	April 22, 2020 ( <i>nunc pro tunc</i> to February 24, 2020)
<b>Time Period Covered</b>	May 1, 2023 – May 31, 2023
<b>Total Fees Incurred</b>	\$108,861.00
<b>Voluntary Fee Reduction (10%)<sup>2</sup></b>	\$10,886.10
<b>Total Fees Requested (Total Fees – Voluntary Fee Reduction)</b>	\$97,974.90
<b>20% Holdback</b>	\$19,594.98
<b>Total Fees Requested Less 20% Holdback</b>	\$78,379.92
<b>Total Expenses Incurred</b>	\$157.60
<b>Total Fees and Expenses Requested</b>	\$98,132.50

Cole Schotz P.C. (“Cole Schotz”), in its capacity as efficiency counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Purdue Pharma, L.P. and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby submits this statement of fees and disbursements (the “Thirty-Ninth Monthly Fee Statement”) covering the period from May 1, 2023 through and including May 31, 2023 (the “Compensation Period”) in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [D.I. 529]. By this Thirty-Ninth Monthly Fee Statement, Cole Schotz requests (a) interim allowance and payment of compensation in the amount of \$97,974.90 for fees on account of reasonable and necessary professional services rendered to the Committee by Cole Schotz and (b) reimbursement of actual and necessary costs and expenses in the amount of \$157.60 incurred by Cole Schotz during the Compensation Period.

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<sup>2</sup> Effective January 1, 2022, Cole Schotz agreed to reduce its monthly fees incurred in this matter by ten-percent (10%).

**FEES FOR SERVICES RENDERED  
DURING THE COMPENSATION PERIOD**

1. **Exhibit A** sets forth a timekeeper summary that includes the respective names, positions, department, bar admissions, hourly billing rates and aggregate hours spent by each Cole Schotz professional and paraprofessional that provided services to the Committee during the Compensation Period. The rates charged by Cole Schotz for services rendered to the Committee are the same rates that Cole Schotz charges generally for professional services rendered to its non-bankruptcy clients.<sup>3</sup>

2. **Exhibit B** sets forth a task code summary that includes the aggregate hours per task code spent by Cole Schotz professionals and paraprofessionals in rendering services to the Committee during the Compensation Period.

3. **Exhibit C** sets forth a complete itemization of tasks performed by Cole Schotz professionals and paraprofessionals that provided services to the Committee during the Compensation Period.

**EXPENSES INCURRED DURING THE COMPENSATION PERIOD**

4. **Exhibit D** sets forth a disbursement summary that includes the aggregate expenses, organized by general disbursement categories, incurred by Cole Schotz in connection with services rendered to the Committee during the Compensation Period.

5. **Exhibit E** sets forth a complete itemization of disbursements incurred by Cole Schotz in connection with services rendered to the Committee during the Compensation Period.

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<sup>3</sup> Cole Schotz increased its rates on September 1, 2022, consistent with its customary practice and as disclosed in Cole Schotz's retention application. See ECF No. 1013. Cole Schotz filed a notice of such rate increase on August 29, 2022. See ECF No. 5043.

**NOTICE**

6. Notice of this Thirty-Ninth Monthly Fee Statement will be given to (i) Purdue Pharma L.P., 201 Tresser Blvd, Stamford, CT 06901, Attn: Jon Lowne ([Jon.Lowne@pharma.com](mailto:Jon.Lowne@pharma.com)); (ii) counsel to the Debtors, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017, Attn.: Christopher Robertson ([christopher.robertson@davispolk.com](mailto:christopher.robertson@davispolk.com)) and Dylan Consla ([dylan.consla@davispolk.com](mailto:dylan.consla@davispolk.com)); (iii) the Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014, Attn: Paul K. Schwartzberg ([Paul.Schwartzberg@usdoj.gov](mailto:Paul.Schwartzberg@usdoj.gov)); and (iv) the independent fee examiner appointed in these chapter 11 cases, David M. Klauder, Esq., Bielli & Klauder, LLC, 1204 N. King Street, Wilmington, Delaware, 19801 ([dklauder@bk-legal.com](mailto:dklauder@bk-legal.com)) (collectively, the “Notice Parties”).

7. Objections to this Thirty-Ninth Monthly Fee Statement, if any, must be filed with the Court and served upon the Notice Parties and undersigned counsel to the Committee so as to be received by no later than September 5, 2023 at 12:00 p.m. (ET) (the “Objection Deadline”), setting forth the nature of the objection and the amount of fees or expenses at issue.

8. If no objections to this Thirty-Ninth Monthly Fee Statement are filed and served as set forth above, the Debtors shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified herein.

9. If an objection to this Thirty-Ninth Monthly Fee Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Thirty-Ninth Monthly Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such an objection is not

resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

Dated: August 22, 2023  
New York, New York

**AKIN GUMP STRAUSS HAUER & FELD LLP**

/s/ Arik Preis

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Arik Preis  
Mitchell Hurley  
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- and -

**COLE SCHOTZ P.C.**

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*Co-Counsel to the Official Committee of Unsecured  
Creditors of Purdue Pharma L.P., et al.*

**EXHIBIT A**

**COMPENSATION BY TIMEKEEPER**  
**MAY 1, 2023 THROUGH MAY 31, 2023**

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Number of Years in that Position</b>	<b>Hourly Billing Rate<sup>1</sup></b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Justin R. Alberto	2008	Member (Bankruptcy) (since 2020)	\$740.00	25.6	\$18,944.00
Patrick J. Reilley	2003	Member (Bankruptcy) (since 2011)	\$730.00	3.1	\$2,263.00
Anthony De Leo	2013	Member (Bankruptcy) (since 2023)	\$685.00	113.20	\$77,542.00
Conor D. McMullan	2019	Associate (Bankruptcy) (since 2022)	\$375.00	12.9	\$4,837.50
Jack M. Dougherty	2021	Associate (Bankruptcy) (since 2020)	\$400.00	11.5	\$4,600.00
Larry Morton	N/A	Paralegal (Bankruptcy) (since 2020)	\$355.00	1.9	\$674.50
<b>TOTAL</b>				<b>168.2</b>	<b>\$108,861.00</b>
<b>Less Voluntary Reduction (10%)</b>					<b>(\$10,886.10)</b>
<b>Total Requested</b>					<b>\$97,974.90</b>

<sup>1</sup> On August 29, 2022 Cole Schotz filed its *Notice of Increase of Hourly Rates of Cole Schotz's Professionals* [ECF No. 5043] which adjusted hourly rates effective September 1, 2022.

**EXHIBIT B**

**COMPENSATION BY PROJECT CATEGORY  
MAY 1, 2023 THROUGH MAY 31, 2023**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Asset Dispositions, Sales, Use, and Leases (Section 363)	0.6	\$425.50
Case Administration	1.4	\$1,036.00
Committee Matters and Creditor Meetings	10.6	\$7,456.50
Creditor Inquiries	1.1	\$814.00
Fee Application Matters/Objections	15.1	\$6,488.50
Litigation/Gen. (Except Automatic Stay Relief)	72.9	\$50,544.00
Preparation for and Attendance at Hearings	6.7	\$4,804.00
Prepare for and Conduct Interview and Depositions	53.8	\$33,182.50
Reorganization Plan	6.0	\$4,110.00
<b>TOTAL</b>	<b>168.2</b>	<b>\$108,861.00</b>
<b>Less Voluntary Reduction (10%)</b>		<b>(\$10,886.10)</b>
<b>Total Requested</b>		<b>\$97,974.90</b>

**EXHIBIT C**

**Invoice**





PURDUE PHARM, L.P.  
N/A - FEE APPLICATION ONLY

Invoice Date: June 8, 2023  
Invoice Number: 950263  
Matter Number: 60810-0001

**Re:** OFFICIAL COMMITTEE OF UNSECURED CREDITORS

FOR PROFESSIONAL SERVICES THROUGH MAY 31, 2023

**ASSET DISPOSITIONS, SALES, USES, AND LEASES (SECTION 363) 0.60 425.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/20/23	JRA	EMAIL WITH UCC MEMBERS RE UCC STATEMENT	0.10	74.00
05/22/23	PJR	REVIEW UCC STATEMENT RE: SALE PROCEEDS	0.20	146.00
05/22/23	ADL	REVIEW REVISED PLEADING RE: AVRIO SALE	0.30	205.50

**CASE ADMINISTRATION 1.40 1,036.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/30/23	JRA	REVIEW SECOND CIRCUIT OPINION	1.40	1,036.00

**COMMITTEE MATTERS AND CREDITOR MEETINGS 10.60 7,456.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/23	PJR	REVIEW EMAIL FROM A. PREIS RE: CASE STATUS AND COMMITTEE UPDATE	0.10	73.00
05/01/23	JRA	EMAIL WITH A. PREIS RE UCC UPDATE	0.10	74.00
05/01/23	ADL	REVIEW UCC UPDATE	0.30	205.50
05/02/23	ADL	REVIEW UCC UPDATE	0.10	68.50
05/03/23	ADL	REVIEW UCC UPDATE AND ATTACHMENTS THERETO	0.80	548.00
05/03/23	JRA	REVIEW A. PREIS UCC UPDATE EMAIL	0.10	74.00
05/04/23	ADL	ATTEND UCC CALL	0.50	342.50
05/06/23	JRA	REVIEW A. PREIS UCC UPDATE EMAIL	0.10	74.00
05/08/23	ADL	REVIEW UCC UPDATE AND ATTACHMENTS THERETO	0.80	548.00
05/09/23	JRA	REVIEW UCC UPDATE MATERIALS	0.20	148.00
05/11/23	ADL	REVIEW UCC UPDATE AND ATTACHMENTS THERETO	0.20	137.00
05/17/23	JRA	EMAILS WITH A. PREIS RE TOMORROW'S UCC CALL	0.10	74.00
05/17/23	ADL	REVIEW UCC UPDATE AND ATTACHMENTS THERETO	1.10	753.50
05/18/23	ADL	REVIEW UCC UPDATE	0.30	205.50
05/18/23	PJR	REVIEW COMMITTEE MATERIALS IN ADVANCE OF CALL	0.30	219.00
05/18/23	JRA	T/C'S WITH A. DE LEO RE TODAY'S UCC MEETING	0.30	222.00
05/18/23	ADL	ATTEND UCC CALL	0.90	616.50

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 60810-0001

Invoice Number 950263  
June 8, 2023  
Page 2

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/18/23	PJR	PARTICIPATE ON COMMITTEE CALL WITH COMMITTEE MEMBERS AND PROFESSIONALS RE: CASE STATUS AND UPDATE	1.00	730.00
05/19/23	JRA	REVIEW DRAFT UCC STATEMENT (.1) AND EMAILS WITH A. PREIS RE UCC UPDATES (.1)	0.20	148.00
05/22/23	JRA	REVIEW UCC UPDATE MATERIALS (.2); EMAIL WITH A. PREIS RE SAME (.1)	0.30	222.00
05/22/23	ADL	REVIEW UCC UPDATES AND ATTACHMENTS THERETO	0.60	411.00
05/22/23	PJR	REVIEW EMAILS FROM A. PREIS RE: CASE UPDATE AND COMMITTEE ISSUES	0.20	146.00
05/25/23	ADL	REVIEW UCC UPDATE AND ATTACHMENTS THERETO	0.40	274.00
05/25/23	ADL	ATTEND UCC CALL	0.60	411.00
05/25/23	PJR	REVIEW EMAIL FROM A. PREIS AND RELATED COMMITTEE MATERIALS RE: CASE STATUS AND COMMITTEE UPDATE	0.20	146.00
05/26/23	JRA	EMAILS WITH A. PREIS, M. ATKINSON AND UCC MEMBERS RE APPEALS AND CASE STATUS	0.60	444.00
05/30/23	PJR	EMAILS FROM A. PREIS RE: CASE STATUS AND UPDATES	0.10	73.00
05/30/23	ADL	REVIEW UCC UPDATE	0.10	68.50

**CREDITOR INQUIRIES****1.10 814.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/22/23	JRA	EMAILS WITH A. DE LEO (.1) AND RETURN OF CREDITOR CALL (.1) RE TOMROROW'S HEARING	0.20	148.00
05/31/23	JRA	RETURN OPIOID CREDITOR INQUIRIES RE SECOND CIRCUIT OPINION AND NEXT STEPS	0.90	666.00

**FEE APPLICATION MATTERS/OBJECTIONS****15.10 6,488.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/02/23	JRA	REVISE FEE APP	0.40	296.00
05/03/23	JRA	EMAIL WITH A. DE LEO RE FEE APPS	0.10	74.00
05/08/23	ADL	EMAIL E. LISOCVICZ RE: FEBRUARY FEE APPLICATION	0.10	68.50
05/09/23	JMD	EMAIL L. MORTON RE: DRAFT APRIL FEE STATEMENT	0.20	80.00
05/09/23	JRA	EMAILS WITH A. DE LEO RE FEE APPS	0.20	148.00
05/09/23	JMD	REVISE DRAFT MARCH FEE APPLICATION	0.10	40.00
05/10/23	LSM	DRAFT THIRTY-EIGHTH MONTHLY FEE APPLICATION FOR COLE SCHOTZ AND FORWARD SAME TO J. DOUGHERTY	1.30	461.50
05/11/23	JMD	EMAILS W/ A. DE LEO RE: MARCH AND APRIL FEE APPS	0.10	40.00
05/11/23	ADL	EMAIL J. DOUGHERTY RE: MARCH FEE APPLICATION	0.10	68.50
05/15/23	JMD	REVIEW/REVISE CS APRIL FEE APP AND EXHIBITS (.9); EMAILS W/ L. MORTON RE: REQUEST LEDES FILE AND REVISIONS TO EXHIBITS (.2)	1.10	440.00
05/15/23	LSM	EMAILS WITH J. DOUGHERTY REGARDING COLE SCHOTZ MONTHLY FEE APPLICATION FOR APRIL 2023	0.30	106.50

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 60810-0001

Invoice Number 950263  
June 8, 2023  
Page 3

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/17/23	LSM	EMAILS WITH J. DOUGHERTY REGARDING APRIL MONTHLY FEE APPLICATION FOR COLE SCHOTZ AND RELATED LEDES FILE	0.30	106.50
05/17/23	JMD	EMAILS W/ A. DE LEO RE: APRIL FEE STATEMENT	0.20	80.00
05/19/23	JRA	EMAIL WITH A. DE LEO RE FEE APP	0.10	74.00
05/19/23	ADL	REVIEW APRIL FEE APPLICATION	0.50	342.50
05/25/23	JMD	DRAFT CS TENTH INTERIM FEE APPLICATION	4.80	1,920.00
05/26/23	JMD	CONTINUE DRAFTING CS TENTH INTERIM FEE APPLICATION	3.80	1,520.00
05/26/23	JMD	EMAIL TO ACCOUNTING DEPARTMENT RE: TENTH INTERIM FEE APP INQUIRIES/MATTERS	0.20	80.00
05/30/23	JMD	EMAILS W/ A. DE LEO AND PRISCILLA CARRIG RE: INTERIM FEE APP CLARIFICATION	0.20	80.00
05/30/23	JMD	CONTINUE TO DRAFT INTERIM FEE APP (.5); EMAILS W/ A. DE LEO RE: SAME (.3)	0.80	320.00
05/30/23	JRA	EMAIL WITH E. LISOVICZ RE FEE APPS	0.10	74.00
05/30/23	ADL	EMAIL J. DOUGHERTY RE: INTERIM FEE APPLICATION	0.10	68.50

**LITIGATION/ GEN. (EXCEPT AUTOMATIC STAY RELIEF)****72.90 50,544.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/23	ADL	REVIEW ESTATE CLAIMS RESEARCH	1.40	959.00
05/01/23	ADL	REVIW ST. PAUL 30(B)(6) LETTER	0.20	137.00
05/01/23	ADL	REVIEW CLAIMS REPORT	0.10	68.50
05/01/23	JRA	EMAILS WITH GILBERT AND A. CRAWFORD RE DISCOVERY LETTERS	0.30	222.00
05/01/23	JRA	EMAILS WITH A. CRAWFORD, R. SHORE AND A. DE LEO RE LETTER TO J. LANE	0.30	222.00
05/02/23	ADL	REVIEW ODARCZENKO DEPOSITION OUTLINE	1.60	1,096.00
05/02/23	ADL	EMAILS RE: INSURANCE LITIGATION DISCOVERY ISSUES	0.30	205.50
05/03/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	1.40	959.00
05/03/23	JRA	FURTHER EMAILS WITH J. RUBINSTEIN AND A. DE LEO RE DISCOVERY	0.30	222.00
05/04/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	2.30	1,575.50
05/07/23	JRA	EMAILS WITH A. CRAWFORD AND A. DE LEO RE DISCOVERY ISSUES	0.20	148.00
05/08/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	3.50	2,397.50
05/10/23	JRA	EMAILS WITH A. DE LEO RE POTENTIAL ESTATE CLAIM	0.20	148.00
05/11/23	ADL	DRAFT TOLLING AMENDMENT RE: ESTATE CLAIMS	0.40	274.00
05/11/23	JRA	EMAILS WITH A. DE LEO RE POTENTIAL ESTATE CLAIM ISSUES	0.10	74.00

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 60810-0001

Invoice Number 950263  
June 8, 2023  
Page 4

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/11/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	0.90	616.50
05/11/23	ADL	EMAILS RE: ESTATE CLAIM TOLLING ISSUES	0.20	137.00
05/11/23	JRA	EMAILS WITH A. DE LEO RE ASPEN AND SRCS POLICY STIP AND EXECUTION OF SAME	0.40	296.00
05/11/23	ADL	REVIEW LIBERTY POLICY STIPULATION	0.40	274.00
05/11/23	ADL	EMAIL J. ALBERTO RE: INSURANCE POLICY STIPULATIONS	0.10	68.50
05/11/23	ADL	REVIEW CLAIMS REPORT	0.10	68.50
05/12/23	ADL	EMAILS RE: INSURANCE LITIGATION DISCOVERY ISSUES	0.10	68.50
05/12/23	ADL	REVIEW AND COMMENT ON ODARCZENKO DEPOSITION REPORT	1.60	1,096.00
05/12/23	ADL	EMAIL UCC TEAM RE: ODARCZENKO DEPOSITION	0.10	68.50
05/12/23	ADL	REVIEW REVISED DRAFT OF LITIGATION STAY LETTER	0.30	205.50
05/12/23	JRA	EMAILS WITH A. DE LEO RE POTENTIAL ESTATE CLAIM	0.20	148.00
05/15/23	ADL	REVIEW PINNEY DEPOSITION NOTICE	0.30	205.50
05/15/23	ADL	EMAILS RE: POLICY STIPULATIONS	0.10	68.50
05/15/23	JRA	EMAIL WITH A. GASKE RE DISCOVERY LETTER	0.10	74.00
05/15/23	JRA	FURTHER EMAILS WITH A. DE LEO RE POTENTIAL ESTATE CLAIM	0.10	74.00
05/15/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	1.90	1,301.50
05/15/23	ADL	EMAILS RE: ESTATE CLAIMS TOLLING ISSUES	0.10	68.50
05/15/23	ADL	EMAIL COUNSEL RE: ESTATE CLAIMS ISSUE	0.10	68.50
05/15/23	ADL	EMAILS RE: CROWLEY DEPOSITION	0.10	68.50
05/16/23	ADL	REVIEW ESTATE CLAIMS RESEARCH	4.10	2,808.50
05/16/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	1.50	1,027.50
05/16/23	ADL	INSURANCE LITIGATION STRATEGY CALL	0.40	274.00
05/16/23	ADL	EMAILS RE: INSURANCE DISCOVERY	0.10	68.50
05/16/23	ADL	REVIEW REVISED ST. PAUL POLICY STIPULATION AND EXHIBITS	0.50	342.50
05/16/23	JRA	EMAILS WITH M. RUSH AND A. DE LEO RE NAVIGATORS DISCOVERY	0.20	148.00
05/17/23	ADL	REVIEW ESTATE CLAIMS RESEARCH	1.20	822.00
05/17/23	ADL	REVIEW PURDUE-UCC PRIVILEGE LOGS	0.90	616.50
05/17/23	ADL	REVIEW REVISED DRAFT CHAMBERS LETTER	0.40	274.00
05/17/23	ADL	REVIEW FILED LETTER TO JUDGE LANE RE: INSURANCE LITIGATION	0.20	137.00
05/17/23	ADL	EMAILS RE: INSURANCE DISCOVERY ISSUES	0.30	205.50
05/17/23	JRA	EMAILS WITH A. CRAWFORD AND N. CRAMB RE DISCOVERY ISSUES IN INSURANCE ADVERSARY (.2) FOLLOW UP EMAILS WITH A. DE LEO RE SAME (.1)	0.30	222.00

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 60810-0001

Invoice Number 950263  
June 8, 2023  
Page 5

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/17/23	ADL	EMAILS RE: INSURANCE DEPOSITIONS	0.30	205.50
05/18/23	JRA	CORRESPOND WITH A. DE LEO, A. VINSON, GILBERT AND INSURANCE COUNSEL RE STAY ISSUES	0.80	592.00
05/19/23	ADL	EMAIL J. ALBERTO RE: MAY 23 STATUS CONFERENCE	0.20	137.00
05/19/23	ADL	CALL WITH J. ALBERTO RE: INSURANCE LITIGATION ISSUES	0.20	137.00
05/19/23	JRA	RESEARCH RE DISMISSAL AND STAY ISSUES	1.70	1,258.00
05/19/23	JRA	EMAILS WITH P. BREENE, R. LEVERIDGE AND A. DE LEO RE STAY REQUEST	0.50	370.00
05/19/23	ADL	ATTEND INSURANCE LITIGATION STRATEGY CALL	0.40	274.00
05/19/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	3.80	2,603.00
05/19/23	ADL	EMAIL A. CRAWFORD RE: INSURANCE LITIGATION	0.10	68.50
05/19/23	ADL	REVIEW LIBERTY MUTUAL RESPONSES AND OBJECTIONS TO INSURANCE DISCOVERY REQUESTS	0.30	205.50
05/21/23	JRA	EMAILS WITH A. PREIS AND UCC MEMBERS RE APPEAL ISSUES AND DISTRIBUTIONS	0.20	148.00
05/22/23	ADL	REVIEW ESTATE CLAIMS RESEARCH	2.20	1,507.00
05/22/23	ADL	CALL WITH J. ALBERTO RE: INSURANCE LITIGATION ISSUES	0.10	68.50
05/22/23	ADL	CONTINUE TO REVIEW ESTATE CLAIMS RESEARCH	0.70	479.50
05/22/23	ADL	EMAIL J. ALBERTO RE: INSURANCE LITIGATION ISSUES	0.10	68.50
05/22/23	ADL	CALL WITH PLAINTIFFS RE: INSURANCE LITIGATION STRATEGY ISSUES	0.10	68.50
05/22/23	JRA	EMAIL WITH A. DE LEO AND S. MILLMAN RE POTENTIAL ESTATE CLAIM	0.10	74.00
05/22/23	ADL	EMAIL COUNSEL RE: ESTATE CLAIMS TOLLING ISSUE	0.10	68.50
05/22/23	ADL	EMAILS RE INSURANCE LITIGATION ISSUES	0.30	205.50
05/22/23	ADL	REVIEW CLAIMS REPORT	0.10	68.50
05/22/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	2.30	1,575.50
05/22/23	JRA	EMAILS (.2) AND T/C (.1) WITH A. DE LEO RE INSURANCE ADVERSARY PROCEEDING	0.30	222.00
05/22/23	JRA	FURTHER EMAILS WITH P. BREENE, R. LEVERIDGE, A. VINSON AND A. DE LEO RE INSURANCE ADVERSARY PROCEEDING AND STRATEGY FOR SAME	0.40	296.00
05/22/23	JRA	PARTICIPATE IN CALL WITH R. LEVERIDGE, P. BREENE, A. CRAWFORD AND A. DE LEO RE INSURANCE ADVERSARY STRATEGY	0.60	444.00
05/22/23	JRA	REVIEW ADDITIONAL RESEARCH RESULTS FOR INSURANCE ADVERSARY STAY HEARING	1.20	888.00
05/22/23	ADL	FOLLOW UP INSURANCE LITIGATION STRATEGY CALL	0.60	411.00
05/22/23	ADL	INITIAL REVIEW OF MAY 23 HEARING OUTLINE	0.50	342.50
05/22/23	ADL	CALL A. CRAWFORD RE: INSURANCE LITIGATION ISSUES	0.10	68.50

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 60810-0001

Invoice Number 950263  
June 8, 2023  
Page 6

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/22/23	JRA	PREPARE FOR CALL WITH ADVERSARY INSURANCE PLAINTIFF'S COUNSEL	0.50	370.00
05/23/23	ADL	CALL WITH J. ALBERTO RE: 5-23 HEARING	0.20	137.00
05/23/23	ADL	CALL WITH J. ALBERTO RE: INSURANCE LITIGATION ISSUES	0.10	68.50
05/23/23	ADL	INSURANCE LITIGATION STRATEGY CALL	0.70	479.50
05/23/23	JRA	FURTHER EMAILS (.4) AND T/C'S (.2) WITH A. DE LEO, GILBERT AND P. BREENE RE TODAY'S HEARING AND NEXT STEPS RE STAY REQUEST	0.60	444.00
05/23/23	JRA	RESEARCH REGARDING STAY REQUESTS IN ADVERSARIES	1.40	1,036.00
05/23/23	ADL	CONTINUE TO REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	2.70	1,849.50
05/23/23	ADL	REVIEW INSURANCE LITIGATION DISCOVERY LETTERS	0.40	274.00
05/23/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	2.30	1,575.50
05/24/23	ADL	FINALIZE ESTATE CLAIMS TOLLING AGREEMENT	0.20	137.00
05/24/23	ADL	EMAILS RE: INSURANCE LITIGATION ISSUES	0.30	205.50
05/24/23	ADL	REVIEW ESTATE CLAIMS RESEARCH	0.60	411.00
05/24/23	JRA	T/C WITH A. PREIS RE APPEAL AND INSURANCE ADVERSARY ISSUES	0.30	222.00
05/24/23	ADL	EMAILS RE: ESTATE CLAIM TOLLING ISSUES	0.20	137.00
05/24/23	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	2.50	1,712.50
05/24/23	ADL	CALL WITH J. ALBERTO RE: INSURANCE LITIGATION AND OTHER CASE STRATEGY MATTERS	0.50	342.50
05/24/23	ADL	REVIEW ESTATE CLAIMS RESEARCH	1.90	1,301.50
05/24/23	ADL	CALL WITH THIRD PARTY COUNSEL RE: ESTATE CLAIMS TOLLING	0.20	137.00
05/25/23	ADL	EMAIL THIRD PARTY COUNSEL RE: ESTATE CLAIM TOLLING ISSUES	0.10	68.50
05/25/23	ADL	EMAILS RE: INSURANCE LITIGATION ISSUES	0.20	137.00
05/25/23	ADL	EMAIL DEBTORS RE: ESTATE CLAIM TOLLING ISSUES	0.10	68.50
05/25/23	ADL	EMAILS RE: ESTATE CLAIM TOLLING ISSUES	0.20	137.00
05/25/23	ADL	COMPILE EXECUTED TOLLING AGREEMENT RE: ESTATE CLAIMS	0.20	137.00
05/26/23	ADL	REVIEW ESTATE CLAIMS RESEARCH	1.70	1,164.50
05/30/23	JRA	RESEARCH RE IMPLICATIONS OF SECOND CIRCUIT ON STAY ISSUES FOR INSURANCE ADVERSARY	0.80	592.00
05/30/23	JRA	T/C WITH A. DE LEO RE SECOND CIRCUIT OPINION	0.40	296.00
05/30/23	JRA	CORRESPOND WITH UCC MEMBERS, A. PREIS AND INTERNALLY RE SECOND CIRCUIT OPINION	0.80	592.00
05/30/23	CDM	REVIEW SECOND CIRCUIT DECISION ENTERED 5/30/23	0.90	337.50
05/30/23	PJR	REVIEW SECOND CIRCUIT OPINION	0.80	584.00
05/30/23	ADL	CALL WITH J. ALBERTO RE: CASE STRATEGY	0.40	274.00

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 60810-0001

Invoice Number 950263  
June 8, 2023  
Page 7

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/30/23	ADL	REVIEW CLAIMS REPORT	0.10	68.50
05/31/23	JRA	SEARCH RE SECOND CIRCUIT OPINION AND EFFECT ON INSURANCE ADVERSARY	1.50	1,110.00
05/31/23	ADL	EMAIL UCC TEAM RE: INSURANCE LITIGATION STATUS CONFERENCE	0.20	137.00
05/31/23	JRA	FURTHER EMAILS WITH INSURANCE COUNSEL RE STATUS CONFERENCE AND STAY ISSUES	0.20	148.00
05/31/23	PJR	CONFERENCE WITH A. DE LEO RE: CASE STATUS, TOLLING AND ADVERSARY ISSUES	0.20	146.00
05/31/23	JRA	CORRESPOND WITH A. DE LEO, REED SMITH AND GILBERT RE STATUS CONFERENCE FOR INSURANCE ADVERSARY PROCEEDING	0.30	222.00

**PREPARATION FOR AND ATTENDANCE AT HEARINGS** **6.70** **4,804.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/19/23	JRA	EMAILS (.2) AND T/C'S (.2) WITH A. DE LEO RE INSURANCE ADVERSARY HEARING	0.40	296.00
05/19/23	ADL	EMAILS RE: COURT CONFERENCE	0.20	137.00
05/22/23	JRA	REVIEW AMENDED HEARING AGENDA	0.10	74.00
05/22/23	ADL	REVIEW AGENDA FOR MAY 23 HEARING	0.10	68.50
05/22/23	JRA	FURTHER EMAILS WITH A. DE LEO RE TOMORROW'S HEARING AND STRATEGY FOR SAME	0.20	148.00
05/23/23	JRA	ATTEND HEARING	2.20	1,628.00
05/23/23	ADL	ATTEND 5-23 HEARING	2.00	1,370.00
05/23/23	JRA	PREPARE FOR TODAY'S HEARING	1.00	740.00
05/23/23	ADL	REVIEW MAY 23 HEARING OUTLINE	0.50	342.50

**PREPARE FOR AND CONDUCT INTERVIEW AND DEPOSITIONS** **53.80** **33,182.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/02/23	JRA	EMAIL WITH C. SORENSON RE DEPOSITION	0.10	74.00
05/03/23	JRA	EMAILS WITH P. BREENE RE DEPS	0.10	74.00
05/05/23	ADL	REVIEW REVISED DRAFT OF ODARCZENKO DEPOSITION OUTLINE	1.60	1,096.00
05/05/23	ADL	CONTINUE TO REVIEW EXHIBITS FOR ODARCZENKO DEPOSITION	1.90	1,301.50
05/05/23	ADL	REVIEW EXHIBITS FOR ODARCZENKO DEPOSITION	2.80	1,918.00
05/09/23	ADL	REVIEW DOCUMENTS AND PREPARE FOR ODARCZENKO DEPOSITION	3.50	2,397.50
05/09/23	ADL	TRAVEL TO ODARCZENKO DEPOSITION (1/2 TIME)	3.00	2,055.00
05/09/23	JRA	CORRESPOND WITH A. DE LEO RE DEP	0.20	148.00
05/10/23	ADL	PREPARE FOR ODARCZENKO DEPOSITION	1.20	822.00
05/10/23	ADL	ATTEND DEPOSITION OF SONIA ODARCZENKO	7.50	5,137.50

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 60810-0001

Invoice Number 950263  
June 8, 2023  
Page 8

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/10/23	CDM	ATTEND DEPOSITION OF SONIA ODARCZENKO FOR NAVIGATORS	7.50	2,812.50
05/10/23	ADL	TRAVEL HOME FROM ODARCZENKO DEPOSITION (1/2 TIME)	2.50	1,712.50
05/10/23	JRA	CORRESPOND WITH A. DE LEO AND C. MCMULLAN RE DEP	0.30	222.00
05/10/23	CDM	REVIEW AND EDIT NOTES FROM DEPOSITION OF SONIA ODARCZENKO FOR NAVIGATORS	0.80	300.00
05/11/23	ADL	ATTEND FOGEL DEPOSITION PREP SESSION	5.00	3,425.00
05/11/23	CDM	DRAFT SUMMARY RE: DEPOSITION OF SONIA ODARCZENKO FOR NAVIGATORS	3.70	1,387.50
05/15/23	JRA	REVIEW UPDATED DEPOSITION CHART	0.10	74.00
05/15/23	ADL	REVIEW FOGEL DEPOSITION OUTLINE	1.50	1,027.50
05/15/23	ADL	REVIEW FOGEL HOT DOCS CHART	0.30	205.50
05/15/23	ADL	REVIEW FOGEL HOT DOCS	2.60	1,781.00
05/16/23	ADL	EMAIL C. MCMULLAN RE: INSURANCE DEPOSITIONS	0.10	68.50
05/16/23	ADL	REVIEW INSURANCE DEPOSITION CALENDAR	0.20	137.00
05/18/23	ADL	ATTEND FOGEL DEPOSITION PREP SESSION	4.30	2,945.50
05/18/23	ADL	REVIEW REVISED FOGEL DEPOSITION OUTLINE	2.10	1,438.50
05/19/23	ADL	EMAILS RE: INSURANCE DEPOSITIONS	0.20	137.00
05/19/23	ADL	REVIEW ADDITIONAL DOCUMENTS RE: FOGEL DEPOSITION	0.60	411.00
05/25/23	JRA	EMAILS WITH L. SZYMANSKI RE DEPS	0.10	74.00

**REORGANIZATION PLAN****6.00 4,110.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/30/23	ADL	EMAIL J. ALBERTO RE: PLAN ISSUES	0.20	137.00
05/30/23	ADL	REVIEW JUDGE MCMAHON DECISION RE: POTENTIAL OPEN ISSUES	1.20	822.00
05/30/23	ADL	REVIEW AND ANALYZE SECOND CIRCUIT OPINION	3.60	2,466.00
05/30/23	ADL	CALL WITH J. ALBERTO RE: SECOND CIRCUIT OPINION AND RELATED PLAN ISSUES	0.40	274.00
05/31/23	ADL	CALL WITH J. ALBERTO RE: STRATEGY POST-SECOND CIRCUIT DECISION	0.40	274.00
05/31/23	ADL	CALL WITH P. REILLEY RE: SECOND CIRCUIT DECISION	0.20	137.00

TOTAL HOURS 168.20

PROFESSIONAL SERVICES: \$108,861.00  
 COURTESY DISCOUNT: \$(10,886.10)  
 ADJUSTED PROFESSIONAL SERVICES: \$97,974.90



Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 60810-0001

Invoice Number 950263  
June 8, 2023  
Page 9

**TIMEKEEPER SUMMARY**

<b><u>NAME</u></b>	<b><u>TIMEKEEPER TITLE</u></b>	<b><u>HOURS</u></b>	<b><u>RATE</u></b>	<b><u>AMOUNT</u></b>
Anthony De Leo	Member	113.20	685.00	77,542.00
Conor D. McMullan	Associate	12.90	375.00	4,837.50
Jack M. Dougherty	Associate	11.50	400.00	4,600.00
Justin R. Alberto	Member	25.60	740.00	18,944.00
Morton, Larry	Paralegal	1.90	355.00	674.50
Patrick J. Reilley	Member	3.10	730.00	2,263.00
	<b>Total</b>	<b>168.20</b>		<b>\$108,861.00</b>

**EXHIBIT D**

**EXPENSE SUMMARY**  
**MAY 1, 2023 THROUGH MAY 31, 2023**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Photocopy/Printing/Scanning		\$43.00
Out of Town Travel		\$114.6
<b>TOTAL</b>		<b>\$157.60</b>

**EXHIBIT E**  
**Expense Detail**

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 60810-0001

Invoice Number 950263  
June 8, 2023  
Page 10

**COST DETAIL**

<b><u>DATE</u></b>	<b><u>Description</u></b>	<b><u>QUANTITY</u></b>	<b><u>AMOUNT</u></b>
05/02/23	PHOTOCOPY /PRINTING/ SCANNING	50.00	5.00
05/10/23	PHOTOCOPY /PRINTING/ SCANNING	1.00	0.10
05/10/23	PHOTOCOPY /PRINTING/ SCANNING	9.00	0.90
05/16/23	Taxi to Hotel (Deposition in Purdue Case)	1.00	62.10
05/16/23	Uber to Airport (Deposition in Purdue Case)	1.00	52.50
05/30/23	PHOTOCOPY /PRINTING/ SCANNING	86.00	8.60
05/30/23	PHOTOCOPY /PRINTING/ SCANNING	142.00	14.20
05/30/23	PHOTOCOPY /PRINTING/ SCANNING	142.00	14.20
	<b>Total</b>		<b>\$157.60</b>

TOTAL SERVICES AND COSTS: \$ 98,132.50